LAW OFFICES OF DAVID WOLFF LLC Attorneys for Trustee 396 Route 34 Matawan, New Jersey 07747 (732) 566-1189 DW/1993

## UNITED STATES BANKRUPTCY COURT DISTRICT OF NEW JERSEY

: Case No. 14-25919-RG

In the Matter of: : Chapter 7 Proceeding

FRANCES FRANK, :

: Hon. Rosemary Gambardella
Debtor. :

\_\_\_\_\_x Hearing Date: February 17, 2015 @ 10:00 a.m.

## NOTICE OF MOTION FOR AUTHORIZATION TO SELL REAL PROPERTY

TO: ALL PARTIES ON CERTIFICATION OF SERVICE

## MADAMES/SIRS:

PLEASE TAKE NOTICE that on Tuesday, February 17, 2015, at 10:00 o'clock in the forenoon or soon thereafter as counsel may be heard, the undersigned attorneys for David Wolff, Chapter 7 Trustee for the above-captioned Debtor, will apply to the Honorable Rosemary Gambardella, United States Bankruptcy Judge, at the United States Bankruptcy Court, Martin Luther King, Jr. Federal Building, 50 Walnut Street, Newark, New Jersey, for entry of an Order authorizing the Trustee to sell real property and personal property located therein, owned by the Debtor and located at 396 Broadway, Bayonne, New Jersey, "as is" for the sum of \$165,000 to 396 Broadway LLC, or to such other party who may make a higher or better offer, and execute any and all documents necessary to consummate the sale. The sale shall be pursuant to Sections

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363 (b) and (f) of the Bankruptcy Code. The sale shall be free and clear of liens, claims, and

encumbrances, with valid liens, claims, and encumbrances to attach to the proceeds of sale.

PLEASE TAKE FURTHER NOTICE that any party wishing to make a higher or better

offer to purchase the subject property may do so by submitting a competing bid in writing to the

Clerk of the United States Bankruptcy Court with a copy to Law Offices of David Wolff LLC

prior to the return date and must appear in Court on the above return date with a 10% deposit in

certified funds, and proof of the financial wherewithal to close the transaction within ten (10)

days of the hearing date.

In support of the within Motion, Movant shall rely upon the annexed Application.

No Brief is necessary in support of this Motion.

LAW OFFICES OF DAVID WOLFF LLC

Attorneys for Trustee

By: /s/ David Wolff

DAVID WOLFF

Dated: January 15, 2015

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